



**FINAL ADMINISTRATIVE DECISION  
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: Jennifer (Bullett) Frost  
DOCKET NO.: 21-38482.001-R-1  
PARCEL NO.: 14-05-117-027-0000

The parties of record before the Property Tax Appeal Board are Jennifer (Bullett) Frost, the appellant, by attorney Brian P. Liston, of the Law Offices of Liston & Tsantilis, P.C. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$30,960  
**IMPR.:** \$11,462  
**TOTAL:** \$42,422

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2021 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

**Findings of Fact**

The subject property consists of a 2-story dwelling of frame exterior construction with 1,964 square feet of living area.<sup>1</sup> The dwelling is approximately 107 years old. Features of the home include a full basement with finished area and a fireplace. The property has a 3,870 square foot site and is located in Chicago, Lake View Township, Cook County. The subject is classified as a class 2-05 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$405,000 as of January 1, 2021. The appraisal was prepared by David Conaghan, a certified general real estate appraiser, and Tom Boyle, Jr., an associate real estate trainee appraiser. The appraisal was

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<sup>1</sup> The Board finds the appraisal submitted by the appellant, which contained a detailed property sketch with measurements and interior photographs, to be the best evidence of the subject's dwelling size and features.

prepared for an ad valorem tax appeal. The appraisers developed the sales comparison approach to value by examining four comparable sales located within .73 of a mile of the subject. The comparables are improved with dwellings of brick, siding, or stucco and siding exterior construction ranging in size from 2,000 to 2,400 square feet of living area. The dwellings are 110 to 123 years old. Each comparable has central air conditioning, a basement with finished area, and either a 1-car or 2-car garage. The comparables have sites ranging in size from 2,370 to 6,200 square feet of land area. The sales occurred from August 2018 to September 2020 for prices ranging from \$360,000 to \$475,000 or from \$160.42 to \$237.50 per square foot of living area, including land. Adjustments were applied for differences between the comparables and the subject property for financing concessions, sale date, dwelling size, bathroom count, and other features to arrive at adjusted prices ranging from \$346,800 to \$453,200. Based on this data, the appraiser arrived at a market value of \$405,000 or \$206.21 per square foot of living area, including land, as of January 1, 2021.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$49,724. The subject's assessment reflects a market value of \$497,240 or \$253.18 per square foot of living area, land included, when using the 10% level of assessment under the Cook County Real Property Assessment Classification Ordinance.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located within .25 of a mile of the subject. The comparables consist of 2-story class 2-05 dwellings of frame exterior construction ranging in size from 1,200 to 1,545 square feet of living area. The dwellings are 113 to 123 years old. Each dwelling has a full basement. Two comparables have central air conditioning, one comparable has a fireplace, and two comparables each have either a 2-car or 2.5-car garage. The parcels contain either 2,750 or 2,825 square feet of land area. The comparables sold from February 2019 to April 2021 for prices ranging from \$524,900 to \$700,000 or from \$365.79 to \$453.07 per square foot of living area, including land. Based on this evidence, the board of review requested confirmation of the subject's assessment.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill. Admin. Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales, or construction costs. 86 Ill. Admin. Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The parties submitted an appraisal and four comparable sales for the Board's consideration. The Board gives reduced weight to the conclusion contained in the appraisal, which relied on sales occurring in 2018 and 2019, less indicative of market value as of the January 1, 2021 assessment date. Furthermore, the appraisers made questionable negative adjustments to these sales for time of sale despite noting moderate growth in the market. The Board will instead analyze the raw sales presented by the parties.

The Board gives less weight to appraisal comparables #3 and #4, as well as board of review comparable #3, which sold less proximate to the assessment date at issue. The Board also gives diminished weight to the remaining comparables submitted by the board of review, which differ significantly from the subject in dwelling size.

The Board finds the best evidence of market value to be appraisal comparables #1 and #2, which sold proximate to the assessment date at issue and are more similar to the subject in age, location, dwelling size, and some features. These most similar comparables sold for prices of \$385,000 and \$455,000 or for \$160.42 and \$216.67 per square foot of living area, including land. The subject's assessment reflects a market value of \$497,240 or \$253.18 per square foot of living area, including land, which is above the best comparable sales in this record. Based on this evidence and after considering adjustments to the best comparables for differences when compared to the subject, the Board finds a reduction in the subject's assessment is justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.

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Chairman

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Member

Member

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Member

Member

\_\_\_\_\_  
Member

Member

\_\_\_\_\_  
Member

Member

DISSENTING: \_\_\_\_\_

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: \_\_\_\_\_

March 18, 2025

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Clerk of the Property Tax Appeal Board

Clerk of the Property Tax Appeal Board

**IMPORTANT NOTICE**

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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